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Adobe Systems Incorporated

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Defendant, *in pro se*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)

Adobe Systems Incorporated,)	Case No. C10-3566 RS
)	
Plaintiff,)	STIPULATION TO EXTEND
v.)	DEADLINE TO COMPLETE ADR
)	
Aldo Secaida, an individual and d/b/a)	
<i>www.brilliantbuys.co.uk</i> , and Does 1 – 10,)	
inclusive,)	
)	
Defendants.)	

PLAINTIFF Adobe Systems Incorporated (“Adobe” or “Plaintiff”), by and through its counsel of record, Nicole L. Drey, of J. Andrew Coombs, A P.C., and Defendant Aldo Secaida, an individual and d/b/a *www.brilliantbuys.co.uk* (“Defendant”), *in pro se*, hereby stipulate and agree as follows:

WHEREAS the Complaint was filed in the above-captioned matter on or about August 13, 2010;

1 WHEREAS the Court issued a Case Management Scheduling Order (“Order”) on or about
2 November 5, 2010;

3 WHEREAS the Court’s Order provided for alternative dispute resolution to be completed
4 by March 4, 2011;

5 WHEREAS the Parties and assigned mediator held a pre-mediation conference call on or
6 about December 29, 2010. At that time, the Parties scheduled mediation to take place on March 3,
7 2011, with a further conference call to discuss settlement prior to formal mediation to take place on
8 January 31, 2011;

9 WHEREAS the Parties and assigned mediator held a further conference call on or about
10 January 31, 2011. At that time, the mediation was rescheduled to March 2, 2011, due to a conflict
11 which had arisen with the mediator, and subsequent conference call was scheduled for February 22,
12 2011;

13 WHEREAS, on or about February 14, 2010, an ADR Program Staff Attorney emailed the
14 Parties and mediator informing that the scheduled mediation could not be canceled at Defendant’s
15 request;

16 WHEREAS the Parties and assigned mediator held a third pre-mediation conference call on
17 or about February 22, 2011, at which time Defendant stated that he could not attend the mediation
18 on March 2, 2011, due to travel arrangements being too expensive;

19 WHEREAS Defendant requested that the mediation be rescheduled to sometime within the
20 following two weeks, beyond the March 4, 2011, deadline, per the Court’s Order;

21 WHEREAS Plaintiff is prepared to attend mediation on March 2, 2011, but does not oppose
22 the continuation of the mediation should the Court grant an extension to the ADR deadline;

23 WHEREAS the mediator has indicated that he could be available at various times
24 throughout the month of March; and
25

1 WHEREAS no other Court deadlines will be affected by an extension of the ADR deadline.
2
3 NOW, THEREFORE, Adobe and Defendant stipulate and request the Court to extend the
4 ADR deadline to April 1, 2011.

5 DATED: February 25, 2011

J. Andrew Coombs, A Professional Corp.

6 By: Nicole L. Drey

J. Andrew Coombs

Nicole L. Drey

7 Attorneys for Plaintiff Adobe Systems Incorporated

8
9 DATED: February 24, 2011

Aldo Secaida, an individual and d/b/a
www.brilliantbuys.co.uk

10
11 By: Aldo Secaida

Aldo Secaida, an individual and
d/b/a www.brilliantbuys.co.uk

12 Defendant, *in pro se*

13
14
15
16 **PROPOSED ORDER**

17 PURSUANT TO REQUEST, IT IS SO ORDERED.

18 DATED: 2/25, 2011

19
20 Richard Secborg

21 Richard Secborg

22 UNITED STATES DISTRICT JUDGE